

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR  
NEW YORK, NEW YORK 10017  
TELEPHONE: (212) 750-7800  
FACSIMILE: (212) 750-3906  
E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL

MARC A. AGNIFILO  
OF COUNSEL

ANDREA L. ZELLAN  
JOSHUA D. KIRSHNER  
JACOB KAPLAN  
TENY R. GERAGOS  
ADMITTED IN NY & CA  
STUART GOLD

July 2, 2020

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Ng Lap Seng, 15-cr-706-3 (VSB)***

Dear Judge Broderick:

Counsel submits this filing to address a letter that was sent to the Court by Defendant Ng Lap Seng himself. (*See* ECF Doc. 957: Ng's Letter).

In his letter, Defendant states that his health has deteriorated since he began his prison sentence, noting that his diseases are chronic, he is unable to exercise with others, and he is not accustomed to the American diet. (*Id.* at 4–5). In particular, Ng's kidney and heart conditions are worsening, he has frequent pains in the left side of his chest, his blood pressure and blood sugar level remain high, his face skin color is often dark, his eyesight is blurry, he has tinnitus (the perception of noise or ringing in the ears), the right side of his body often feels numb, he has difficulty moving his hands and feet, he gets many headaches, he has insomnia, and he often experiences a dull pain in his liver and gallbladder area. (*Id.* at 5–6). Although there has been no confirmed COVID-19 cases at Defendant's prison (FCI Allenwood Low), he fears for his life because the virus would spread quickly throughout the prison if just one staff member or inmate gets infected. (*Id.* at 6–7). Ng misses his family and friends and worries that he may never see them again. (*Id.* at 1–7). Ng requests that the Court help him in "an appropriate way." (*Id.* at 7).

BRAFMAN & ASSOCIATES, P.C.

Counsel respectfully requests that the Court deem Ng's letter as a request for reconsideration of his 18 U.S.C. § 3582(c)(1)(A) motion for compassionate release. (*See* ECF Docs. 935, 937, 944, 946, 948).

Counsel will inform Defendant that any communications with the Court must go through counsel.

Respectfully submitted,



Benjamin Brafman, Esq.  
Jacob Kaplan, Esq.  
Stuart Gold, Esq.  
Brafman & Associates, P.C.  
767 3rd Avenue, 26th Fl.  
New York, NY 10017  
Tel: (212) 750-7800  
Fax: (212) 750-3906